

January 22, 2021

Mr. David Albright
Manager, Groundwater Protection Section
USEPA Region 9 (WTR-4-2)
75 Hawthorne St
San Francisco, CA 94105

Subject: Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1
Notification of AL and AQL Exceedances at supplemental monitoring well M59-O

Dear Mr. Albright:

Florence Copper is providing this notification of alert level (AL) and AQL level exceedances at supplemental monitor well M59-O under Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1 (Permit).

On December 28, 2020, Florence Copper became aware of potential AL/AQL exceedances at Supplemental Monitor Well M59-O from a sample collected 12/1/2020. The potential AL/AQL exceedances were for gross Alpha (adjusted), gross Beta, and radium. Potential AL exceedances for magnesium, sulfate, TDS, and total uranium were also noted. A verification sample was collected on December 29, 2020. Results from the verification sample confirmed the exceedances. As outlined in Part II.H.2.a.ii. and Part II.H.b.ii of the Permit, Florence Copper is hereby notifying EPA Region 9 within five days of becoming aware on January 18, 2021 that the parameter exceedances listed in the table below have been confirmed.

Parameter	Initial Sample Result 12/28/20	Verification Sample Result 1/18/21	Type of Exceedance - AL or AQL - and Threshold
Magnesium	57.2 mg/L	63.1 mg/L	AL – 23 mg/L
Sulfate	865 mg/L	960 mg/L	AL –202 mg/L
Total dissolved solids (TDS)	1,860 mg/L	1800 mg/L	AL – 854 mg/L
Total Uranium	0.037 mg/L	0.038 mg/L	AL – 0.0052 mg/L
Adjusted Gross Alpha	73.5 ± 3.7 pCi/L	35.4 ± 2.5 pCi/L	AL and AQL – Both 15.8 pCi/L
Gross Beta	43.2 ± 2.7 pCi/L	52.7 ± 3 pCi/L	AL and AQL – Both 16 pCi/L
Radium 226+228	19.8 ± 0.8 pCi/L	22.0 ±0.8 pCi/L	AL and AQL - Both 6.9 pCi/L

Monitoring well M59-O is located on the east side of the PTF well field. Analytical results for water quality samples taken from this well over the past year and a half have shown alert level exceedances for a number of analytes, including adjusted gross alpha. Corrective actions that Florence Copper institutes when there is an alert level exceedance include sending a camera down the well to create a video log of the inside of the well. If the video log shows that precipitates have built up in the well, the well is redeveloped. The well may also be pumped continuously to try to clear out the precipitates.

Additional corrective actions are being initiated including installation of a pump into observation well O-02, which is 100 feet west of M59-O, to draw the rinse solutions back towards the wellfield. After well O-02 is pumped for three weeks, M59-O will be resampled.

As required by Part II.H.2.a.iv., Florence Copper will submit a written report within thirty (30) days (on or before February 17, 2021) providing an evaluation of the cause, impacts, or mitigation of the AL exceedance.

Please feel free to contact me should you have any questions or comments.

Sincerely,
Florence Copper, Inc.



Brent Berg
General Manager

Cc: Nancy Rumrill, EPA Region 9
Maribeth Greenslade, ADEQ